

## **Exhibit J**

Dr. Saad S. Antoun HIGHLY CONFIDENTIAL  
Roseland, NJ

August 2, 2005

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

In Re: PHARMACEUTICAL	MDL DOCKET NO.
INDUSTRY AVERAGE WHOLESALE	CIVIL ACTION
PRICE LITIGATION	01CV12257-PBS

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THIS DOCUMENT RELATES TO:

ALL ACTIONS

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Tuesday, August 2, 2005

10:35 a.m.

HIGHLY CONFIDENTIAL VIDEO DEPOSITION of  
DR. SAAD S. , held at the offices of Wolf,  
Block, Schorr and Solis-Cohen, 101 Eisenhower  
Parkway, Roseland, New Jersey, a Certified  
Shorthand (Stenotype) Reporter and Notary Public.

Henderson Legal Services  
(202) 220-4158

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Dr. Saad S. Antoun HIGHLY CONFIDENTIAL  
Roseland, NJ

August 2, 2005

Page 33

1 remember. It was a long conversation because she  
2 tried to convince me -- and I was billing Lupron  
3 at that time with the American Express card, and  
4 then -- this was what we were using, and said but  
5 the company was not using American Express card  
6 so she offered me that she's going to give me a  
7 card and pay for it, so I can bill for it. She  
8 tried to facilitate everything for me because my  
9 staff was, again, changing to be honest with you.

10 Q She said she would get you an  
11 American Express card?

12 A I was paying with American Express  
13 card. We don't use American Express card. We  
14 have Visa or Mastercard or whatever so she got me  
15 a card to bill on it.

16 Q She made a call that allowed you  
17 to bill on your American Express card?

18 A No.

19 Q No. I'm sorry.

20 A She was -- The company don't  
21 accept American Express card.

22 Q Okay.

Dr. Saad S. Antoun HIGHLY CONFIDENTIAL  
Roseland, NJ

August 2, 2005

Page 34

1           A       So she went and got me a Visa  
2 card, whatever it is, to bill on it.

3           Q       How was she able to get you a Visa  
4 card in your name?

5           A       She got the information, my name  
6 and everything.

7           Q       You gave her your personal  
8 information?

9           A       Yeah.

10          Q       And then she took that information  
11 and applied for a Visa card?

12          A       Correct. Something like that. I  
13 don't remember the details, but the fact of the  
14 matter, I got a card. I don't know what the  
15 details are.

16          Q       You ended up getting a Visa card  
17 from her?

18          A       Visa, Mastercard; I don't recall.

19          Q       What else do you recall about the  
20 initial meeting between yourself and Ms. Ryan in  
21 relation to her trying to convince you to try and  
22 switch over?

Dr. Saad S. Antoun HIGHLY CONFIDENTIAL  
Roseland, NJ

August 2, 2005

Page 35

1 MR. FLYNN: Objection.

2 A I don't understand the question,  
3 what you trying to say.

4 Q Okay. She told you that the  
5 injection, you no longer have to use anesthetic;  
6 is that correct? She said -- she helped you get  
7 a Visa card and she said it would be cheaper. Is  
8 there anything else you remember?

9 A That she's going to give me a  
10 discount because I'm going to make the same  
11 amount of money which I'm making from Lupron.  
12 You're not going to lose anything. You're going  
13 to help me. And this is -- you can bill for it  
14 no problem, because this was the trend they give  
15 you. When Lupron is started as I was trying to  
16 refer to you before about this paper that Lupron  
17 is offering you a free product to use this for  
18 the first time to give it to the patient and you  
19 bill Medicaid for it, it's not a sample. It's  
20 clearly stated in this paper which I give it to  
21 you.

22 So she tried to compete with

Dr. Saad S. Antoun HIGHLY CONFIDENTIAL  
Roseland, NJ

August 2, 2005

Page 36

1 Lupron to give you something like that.

2 Q Let's go ahead and talk about that  
3 letter. Could I have a copy?

4 A You have a copy.

5 MR. GORRELL: You have it.

6 MR. MEZA: I know. I want to put  
7 a stamp on it so he knows what it looks  
8 like.

9 Q Let me show you, you're referring  
10 to Exhibit Antoun 012, is that correct, Dr. Antoun.

11 A Right.

12 Q Now, at the time that you looked  
13 at -- excuse me. At the time you had this  
14 conversation with Ms. Ryan, did you already have  
15 Exhibit Antoun 012 in your records?

16 A Yes.

17 Q Did you show Ms. Ryan Exhibit Antoun 012?

18 A No.

19 Q Did you tell Ms. Ryan about the  
20 circumstances under which you were receiving a  
21 free sample from Lupron?

22 A No.